

JUDGE JONES

ZIM AMERICAN INTEGRATED  
SHIPPING SERVICES, INC.,

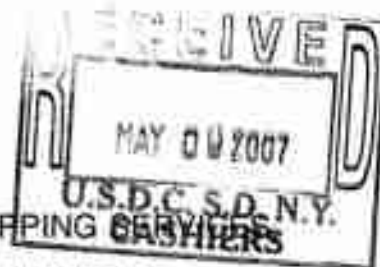
Plaintiff,

07 CV 3675

- against -

CIVIL COMPLAINT  
IN ADMIRALTYANDERSON INTERNATIONAL  
GLOBAL, LLC, a/k/a  
WORLDWIDE PAPER CO.,

Defendant.



Plaintiff ZIM AMERICAN INTEGRATED SHIPPING SERVICES

INC., by its attorneys, LAW OFFICES OF ALBERT J. AVALLONE &  
ASSOCIATES, as and for its Complaint against defendant ANDERSON  
INTERNATIONAL GLOBAL, LLC, a/k/a WORLDWIDE PAPER CO., in  
personam, in a cause of action civil and maritime, alleges upon information and belief:

1. This is an admiralty and maritime claim within the meaning of Rule  
9(h) of the Federal Rules of Civil Procedure, the Ocean Shipping Reform Act of  
1999, 46 U.S.C., App. Section 1701, et seq., and Paragraph 24 of the Bill of  
Lading.

2. At all times hereinafter mentioned, plaintiff ZIM INTEGRATED  
SHIPPING SERVICES, INC. was and still is a corporation duly organized and  
existing under the laws of the State of Delaware with offices and a place of business  
at 5801 Lake Wright Drive, Norfolk, VA 23502.

3. Upon information and belief and at all times hereinafter mentioned,  
defendant ANDERSON INTERNATIONAL GLOBAL, LLC, a/k/a WORLDWIDE  
PAPER CO. was and still is a corporation organized and existing under the laws of  
the State of Illinois, with offices and a place of business at 60-B West Terra Cotta  
Ave., #234, Crystal Lake, IL 60014, with an agent for service of process at Law  
Offices of Andrew Sagartz, 1880 W. Winchester Road, Suite 206, Libertyville, IL

4. On or about March 6, 2006, defendant delivered to plaintiff four

forty-foot containers SAID TO CONTAIN: WASTE PAPER, for the purpose of having the goods carried from New York to Ningbo, China by plaintiff.

5. The goods were carried by plaintiff to Ningbo, discharged from the Vessel, and the ocean freight and related charges under B/L ZIMUORF34605 were paid by defendant to plaintiff.

6. After discharge of the cargo, the consignee failed to pick-up the goods, which remained at the port of Ningbo.

7. Customs in Ningbo required that plaintiff return the shipment to the port of loading.

8. Defendant was notified of the Custom Order that plaintiff return the cargo to the port of loading, and was requested by ZIM to advise if another disposition of defendant's goods was requested.

9. Defendant has failed to respond to plaintiff's requests.

10. On or about July 12, 2006, plaintiff, on orders from Customs in Ningbo, loaded the cargo on the Vessel ZIM CALIFORNIA for return to the port of loading, and issued B/L ZIMUNGB703216, and Freight Corrector, totalling \$16,059.00 for the return trip to the port of loading as ordered by Ningbo Customs (Exhibit A - 3 pages).

11. The cargo was returned to New York, discharged from plaintiff's Vessel, and remains at the port.

12. Plaintiff has performed all duties and obligations required to be performed by plaintiff.

13. Defendant has failed and refused and continues to fail and to refuse to remit the \$16,059.00 due, although duly demanded.

14. By reason of the foregoing, plaintiff has sustained damages in the amount of \$16,059.00 which, although duly demanded, have not been paid.

WHEREFORE, plaintiff prays:

1. For judgment in the amount of plaintiff's damages, together with

interest thereon from the date due, costs, disbursements, and a reasonable attorney's fee.

2. That process in due form of law according to the practice of this Court in cases of admiralty and maritime jurisdiction may issue against the defendant citing it to appear and answer all the singular matters aforesaid.

3. That plaintiff have such other and further relief in the premises as in law and justice it may be entitled to receive.

Dated: New York, New York  
May 8, 2007

LAW OFFICES OF  
ALBERT J. AVALLONE & ASSOCIATES

By



Albert J. Avallone - AA1679  
Attorneys for Plaintiff  
ZIM AMERICAN INTEGRATED  
SHIPPING SERVICES, INC.  
551 Fifth Avenue, Suite 1625  
New York, NY 10176  
(212) 696-1760

[illegible]

THE NEW YORK PUBLIC LIBRARY  
ASTOR LENOX TILDEN FOUNDATIONS  
500 5TH AVENUE  
NEW YORK, N.Y. 10017-2471

[illegible]

If Merchant enters a value, Genesys will log it in the call log and will not be used for any other purpose.

H. 4713, LD 89, introduced the House in August of the past session, has passed the House of the General Bill of Law by a vote before. A. of this bill is to do. If this Bill or ending is compared to even the most governmental before this year, and the bill is a bill.

FIELD NO. 5531

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1942-43 DATE OF ISSUE

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From: Chen Wine  
 Sent: Thursday, January 25, 2007 7:51 PM  
 To: Coffin Frank; Ying David; IMFRT(ZIMCSC-ORF); AR(ZIMFIN-ORF); ARTP(ZIMFIN-ORF);  
 Cc: Shi Nevir; Ren Binqian; Meng Alex; Wilson Renee; Lang Deanna; Boston Shocna  
 Subject: RE: Subject: MNF.CORR ZCF/17E, CNNGB 703216 F

Subject: MNF.CORR ZCF/17E, CNNGB 703216 F

RE: MEX. CORR. BASED ON 308-610001.  
 THE COT ADDRESS:  
 177

RE MANIFEST COTTON 01 MEX FOR CORRECTOR NO. 308-15/2007 26/01/2007

WEIGHT : 207,177.5 HAILING: 03/12/06  
 SKETCH : 00007-00007-00007  
 177 : 0100000000000000

SHIPPER : QINQING KONGHONG INC AND EXP CO., LTD  
 CONSIGNEE : NORWATIME PAPER CO.  
 BUYER : NORWATIME PAPER CO.

#### DESCRIPTION OF GOODS:

3,538,0145811 MEX PAPER WA MEX PAPER 60

#### CONTAINER DETAILS:

CONTAINER	NO	SEAL	QTY	PKGS	WEIGHT	MEASURE
TEXUS199475	00	11007000	37	RLS	20000.00	55.000
DESD4501195	00	11007000	36	RLS	20000.00	55.000
DESD4501195	00	11007000	36	RLS	20000.00	55.000
DESD4501195	00	11007000	36	RLS	20000.00	55.000
DESD4501195	00	11007000	36	RLS	20000.00	55.000
TOTAL			141		80000.00	220.000

#### FREIGHT + CHARGES:

CHARGE	QTY	PERFECT	TOTAL
PORT/STORAGE FREIGHT	00	0.00	0.00
PAYMENT CANAL SURCHARGE	00	0.00	0.00
DESTINATION (DOCK) BELL	00	0.00	0.00
PEAK SURCHARGE	00	0.00	0.00
SECURITY SURCHARGE	00	0.00	0.00
TECH-INTERNATIONAL SAIF	00	0.00	0.00
TOTAL	00	0.00	0.00

MANIFEST SHOULD BE READ AS FOLLOWS:-

SHIPPER : QINQING KONGHONG INC AND EXP CO., LTD

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